

UNITED STATES DISTRICT COURT

for the

District of _____

Division _____

FILED

2024 MAY 16 PM 4:32

CLERK, US DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY

CR

Case No.

1:24CV00527

(to be filled in by the Clerk's Office)

RP

Jury Trial: (check one) ☒ Yes ☐ No

Ahmad Tafta

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

State of Texas

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Ahmad Tafta

Street Address

3507 N LAMAR BLVD #300884

City and County

Austin Travis

State and Zip Code

Texas 78705

Telephone Number

317-657-0767

E-mail Address

abuyousef66@hotmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name Texas
Job or Title (if known) _____
Street Address 1100 Congress Ave
City and County Austin Travis
State and Zip Code Texas Travis 78701
Telephone Number 512-463-2000
E-mail Address (if known) _____

Defendant No. 2

Name Travis county
Job or Title (if known) _____
Street Address 416 West 11 Street
City and County Austin Travis
State and Zip Code Texas 78701
Telephone Number 512-854-9400
E-mail Address (if known) _____

Defendant No. 3

Name Heman Marion Sweatt Travis County
Job or Title (if known) _____
Street Address 1000 Guadalupe Street
City and County Austin Travis
State and Zip Code Texas 78701
Telephone Number 512-854-9457
E-mail Address (if known) _____

Defendant No. 4

Name Roscoe Properties
Job or Title (if known) _____
Street Address 4404 E Oltorf Street
City and County Austin Travis
State and Zip Code Texas 78741
Telephone Number 512-912-7661
E-mail Address (if known) _____

Defendant No. 1

Name Miranda McArthur
Job or Title *(if known)* Regional Manager Roscoe Properties
Street Address 3105 Kenner Drive
City and County Pflugerville Travis
State and Zip Code Texas 78660
Telephone Number 512-988-9503
E-mail Address *(if known)* miranda.mcarthur@roscoeproperties.com

Defendant No. 2

Name _____
Job or Title *(if known)* _____
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____
E-mail Address *(if known)* _____

Defendant No. 3

Name _____
Job or Title *(if known)* _____
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____
E-mail Address *(if known)* _____

Defendant No. 4

Name _____
Job or Title *(if known)* _____
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____
E-mail Address *(if known)* _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

FAIR HOUSING Act - FHA - 42 U.S.C 3601 - 3619
CIVIL RIGHTS Act - 1866 - 42 U.S.C 1982

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) Ahmad Lafta, is a citizen of the
State of (name) Texas.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
under the laws of the State of (name) _____,
and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) State of Texas, is a citizen of
the State of (name) Texas. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

The defendants willful and malicious actions warrant punitive Damages of \$500,000 to deter similar future behavior \$4,000 value of the stolen property.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

11/21/2016 the Defendant (Roscoe Properties) unlawfully took possession of my Personal Property without consent. The theft occurred at my home located at (4404 Eoltorf St) Apt 13102C.

Denial of Equal Protection and Racial Discrimination:
During the handling of case in 2016 she was Denied equal protection under law and subjected to Racial discrimination. I was not aware of the measures taken against me.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Request for Reconsideration

I respectfully ask the court to reconsider this case from 2016 because I did not receive equal protection under the law and was unaware of the procedures applied against me. The mishandling of this case has caused me significant financial and discrimination denying me justice.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.


A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 05/16/2024

Signature of Plaintiff

Printed Name of Plaintiff


Ahmad Lafta

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address